

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

HELEN A. RUNGE,	:	
Plaintiff	:	
v.	:	No. 05-10849-RGS
	:	(Judge Stearns)
WALTER J. KELLY; KERRY L.	:	
BLOOMINGDALE, M.D.; and	:	
SUNBRIDGE NURSING AND	:	CIVIL ACTION
REHABILITATION CENTER,	:	
Defendants	:	JURY TRIAL DEMANDED

PLAINTIFF HELEN A. RUNGE'S ASSENTED-TO-MOTION  
FOR EXTENSION OF TIME TO RESPOND TO  
DEFENDANT KERRY L. BLOOMINGDALE'S MOTION TO DISMISS

AND NOW, COMES, Plaintiff, Helen A. Runge ("Plaintiff"), and requests this Honorable Court to grant Plaintiff an extension of two weeks to file a response to the Motion to Dismiss of Defendant Kerry L. Bloomingdale. As grounds therefor, Plaintiff states as follows:

1. Defendant Bloomingdale filed a Motion to Dismiss on November 2, 2005.
2. Plaintiff's response to Defendant Bloomingdale's Motion is due November 16, 2005.
3. Plaintiff requires additional time to respond to Defendant Bloomingdale's Motion, and Defendant Bloomingdale, through counsel, has provided assent to this request.

4. Additionally, the remaining Defendant parties who have filed an appearance in this matter, to wit: Defendant Sunbridge Nursing and Rehabilitation Center, through counsel has assented to this Motion and Defendant Walter J. Kelly, through counsel has been contacted but not expressed a position.

5. No parties will be prejudiced by the granting of this motion and its extension of time.

WHEREFORE, Plaintiff, Helen A. Runge, moves this Honorable Court to grant her motion for extension until November 30, 2005, to file her response to Defendant Bloomingdale's Motion to Dismiss.

Respectfully submitted,

LATSHA DAVIS YOHE & MCKENNA, P.C.

Dated: November 15, 2005

By /s/ Glenn R. Davis  
Glenn R. Davis, Esq.  
1700 Bent Creek Boulevard, Suite 140  
Mechanicsburg, PA 17050  
(717) 620-2424  
gdavis@ldylaw.com  
*Pro Hac Vice*

Attorneys for Plaintiff, Helen A. Runge

**LOCAL RULE 7.1 CERTIFICATION**

I, Glenn R. Davis, counsel for Plaintiff, Helen A. Runge, certify that I have spoken with counsel for Defendants Walter J. Kelly, Defendant Kerry L. Bloomingdale, M.D., and Sunbridge Nursing and Rehabilitation Center regarding Plaintiff, Helen A. Runge's motion for extension to file a response. All parties have assented to this motion except Defendant Kelly who has not expressed a position.

Dated: November 15, 2005

/s/ Glenn R. Davis  
Glenn R. Davis